

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KEITH FORD, *individually and on behalf
of all others similarly situated*

Plaintiff,

CIVIL ACTION NO. _____

v.

UHG I, LLC, UNITED HOLDINGS
GROUP, LLC and HARRISLOFTUS,
PLLC,

Defendants.

NOTICE OF REMOVAL (FEDERAL QUESTION)

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to 28 U.S.C. §§ 1331 and 1441 *et seq.*, and 15 U.S.C. § 1692 *et seq.*, Defendant HarrisLoftus, PLLC (“Defendant”), with the consent of Co-Defendants UHG I, LLC and United Holdings Group, LLC, hereby gives notice of removal of this cause of action, under the caption *Keith Ford, individually and on behalf of all others similarly situated v. UGH I, LLC, United Holdings Group, LLC and HarrisLoftus, PLLC* from the Circuit Court for Anne Arundel County, Maryland, under Case No. C-02-CV-22-000317 (“State Court Action”) to the United States District Court for the District of Maryland. In support of removal, Defendant, by and through its attorneys, states as follows:

1. On February 21, 2022, Plaintiff Keith Ford (“Plaintiff”) filed this action in the Circuit Court for Anne Arundel County, Maryland. A copy of the state court record is attached as Exhibit 1. The undersigned is not aware of any other documents that have been filed in this matter.

2. Plaintiff served Defendant on March 9, 2022. This removal is timely pursuant to 28 U.S.C. § 1446(b).

3. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441(b) in that it presents a federal question, wherein Plaintiff alleges violations of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.* This Court is the proper district for removal because the Circuit Court for Anne Arundel County, Maryland is located within the jurisdiction of the United States District Court for the District of Maryland.

4. Co-Defendants UHG I, LLC and United Holdings Group, LLC, consent to this removal.

5. Notice of this removal will be filed with the Circuit Court for Anne Arundel County, Maryland.

6. By virtue of this Notice of Removal of Action and the Notice filed in the Action, Defendant does not waive its rights to assert any personal jurisdictional defenses or file other pre-answer motions including Federal Rule of Civil Procedure 12 motions and/or motions to compel arbitration as permitted by the Federal Rules of Civil Procedure.

WHEREFORE, Defendant requests that further proceedings in the Circuit Court for Anne Arundel County, Maryland, be discontinued and that this action be removed in its entirety to the United States District Court for the District of Maryland, which will then assume full jurisdiction over this cause of action.

THE LAW OFFICES
OF RONALD S. CANTER, LLC

/s/ Ronald S. Canter

Ronald S. Canter, Esquire, Bar #01024
200A Monroe Street, Suite 104
Rockville, Maryland 20850
Telephone: (301) 424-7490
Facsimile: (301) 424-7470
E-Mail: rcanter@roncanterllc.com
Attorney for Defendant HarrisLoftus, PLLC

CERTIFICATE OF SERVICE

The undersigned hereby states that on April 7, 2022 he served the following parties with a copy of the Notice of Removal in Federal Court with Exhibits, Civil Cover Sheet and this Certificate of Service via first class mail, postage prepaid as follows:

Emanwel J. Turnbull, Esq.
Peter A. Holland, Esq.
The Holland Law Firm, P.C.
914 Bay Ridge Rd., Ste 230
Annapolis, MD 21403
Attorneys for Plaintiff

Xerxes Martin, Esq.
Malone Frost Martin, PLLC
Northpark Central, Suite 1850
Dallas, Texas 75231
Attorney for Defendants UHG I, LLC and United Holdings Group, LLC

/s/ Ronald S. Canter

Ronald S. Canter, Esq.
Attorney for Defendant HarrisLoftus, PLLC